

**HALL PRANGLE & SCHOONVELD, LLC**  
 RAINBOW CORPORATE CENTER  
 777 NORTH RAINBOW BLVD., STE. 225  
 LAS VEGAS, NEVADA 89107  
 TELEPHONE: 702-889-6400 FACSIMILE: 702-384-6025

JONQUIL WHITEHEAD, ESQ.  
 Nevada Bar No.: 10783  
 HALL PRANGLE & SCHOONVELD, LLC  
 777 N. Rainbow Blvd., Ste. 225  
 Las Vegas, NV 89107  
 (702) 889-6400- Office  
 (702) 384-6025 – Facsimile  
[jwhitehead@hpslaw.com](mailto:jwhitehead@hpslaw.com)

PETER E. KANARIS (Pro Hac Vice)  
 DAVID E. HEISS (Pro Hac Vice)  
 MEGAN E. RITENOUR (Pro Hac Vice)  
 FISHER KANARIS, P.C.  
 200 South Wacker Drive, 22nd Floor  
 Chicago, Illinois 60606  
 Tel: (312) 474-1400  
 Fax:(312) 474-1410  
*Attorneys for Defendants*

**UNITED STATES DISTRICT COURT  
 DISTRICT OF NEVADA**

OLIN CORPORATION, and PIONEER  
 AMERICAS, LLC d/b/a OLIN CHLOR  
 AKALI PRODUCTS,

Plaintiffs,

v.

CONTINENTAL CASUALTY COMPANY,  
 FACTORY MUTUAL INSURANCE  
 COMPANY, ZURICH AMERICAN  
 INSURANCE COMPANY, ZURICH  
 INSURANCE IRELAND, LTD., NATIONAL  
 UNION FIRE INSURANCE COMPANY of  
 PITTSBURGH, PENNSYLVANIA, and ACE  
 AMERICAN INSURANCE COMPANY,

Defendants.

CONTINENTAL CASUALTY COMPANY,  
 Plaintiff,  
 v.  
 OLIN CORPORATION,  
 Defendant.

Case No.: 2:10-CV-00623  
 Case No.: 2:10-CV-01298

**DEFENDANT CONTINENTAL  
 CASUALTY COMPANY’S MOTION TO  
 FILE DOCUMENTS UNDER SEAL IN  
 SUPPORT OF ITS MOTION *IN LIMINE*  
 TO EXCLUDE THE TESTIMONY OF  
 BURL DANIEL (DKT. #245)**

**HALL PRANGLE & SCHOONVELD, LLC**  
RAINBOW CORPORATE CENTER  
777 NORTH RAINBOW BLVD., STE. 225  
LAS VEGAS, NEVADA 89107  
TELEPHONE: 702-889-6400 FACSIMILE: 702-384-6025

1 NOW COMES Defendant Continental Casualty Company (“Continental”), by and  
2 through their undersigned attorneys of record, and for its Motion to File Documents Under Seal  
3 in Support of its Motion *in Limine* to Exclude Testimony of Burl Daniel, states as follows:

4 1. On January 17, 2013, Defendant Continental filed its Motion *in Limine* to Exclude  
5 Testimony of Burl Daniel (Dkt. #245).

6 2. Defendant Continental cited three exhibits in conjunction with its motion:

- 7 a. Exhibit A – Plaintiffs’ Rule 26(a)(2) Expert Disclosure  
8 b. Exhibit B – Expert Report of Burl Daniel  
9 c. Exhibit C – Deposition Transcript of Burl Daniel

10 3. In accordance with the Stipulated Protective Order filed by the Parties (Dkt. #63) and  
11 the entered by this Court (Dkt. #65), Defendant Continental respectfully requests that the  
12 exhibits cited in Defendant Continental’s Motion *in Limine* to Exclude Testimony of Burl Daniel  
13 be filed under Seal as Confidential information in accordance with the Stipulated Protective  
14 Order filed by the Parties (Dkt. #63) and the entered by this Court (Dkt. #65).

15 Dated this 21<sup>st</sup> day of January, 2013

16  
17 Respectfully submitted,

18 ATTORNEYS FOR DEFENDANT  
19 CONTINENTAL CASUALTY COMPANY

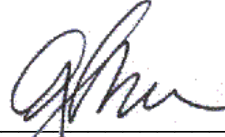
20 By: /s/ Jonquil Whitehead  
21 Jonquil Whitehead  
22 Nevada Bar # 10783  
23 HALL PRANGLE & SCHOONVELD, LLC  
24 777 N. Rainbow Blvd., Ste. 225  
25 Las Vegas, NV 89107

26 /s/ Megan E. Ritenour  
27 Peter E. Kanaris (*Pro Hac Vice*)  
28 David E. Heiss (*Pro Hac Vice*)  
Megan E. Ritenour (*Pro Hac Vice*)  
FISHER KANARIS, PC  
200 South Wacker Drive, 22nd Floor  
Chicago, Illinois 60606

**HALL PRANGLE & SCHOONVELD, LLC**  
RAINBOW CORPORATE CENTER  
777 NORTH RAINBOW BLVD., STE. 225  
LAS VEGAS, NEVADA 89107  
TELEPHONE: 702-889-6400 FACSIMILE: 702-384-6025

**ORDER**

**IT IS SO ORDERED** this 23rd day of January, 2013.



---

Gloria M. Navarro  
United States District Judge

...

...

...